



Attorneys at Law

Trinity Centre  
115 Broadway, 17th Floor  
New York, NY 10006  
Tel: (212) 566-1000  
Fax: (212) 566-1068  
email@sullivanbrill.com

## MEMO ENDORSED

October 19, 2012

Via Email

Honorable Richard J. Sullivan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Taijay Todd*  
12 Cr. 45 (RJS)

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 10-19-12
---

Dear Judge Sullivan:

As Your Honor knows, I was assigned to represent Mr. Todd on Wednesday, October 17, 2012. Since then, I have acquired the entire file from Mr. Todd's former attorney, Ellyn Bank, and have met with Mr. Todd on two occasions. I have also conferenced the matter with both Ms. Bank and the government. I am also aware Ms. Bank had previously filed motions on which argument and testimony is scheduled for Wednesday, October 24, 2012.

Despite my attempts to get up to speed on the case, it is evident that I require more time to thoroughly prepare for the upcoming court appearance. It is therefore my respectful request that the court appearance be rescheduled to November 7, 2012 at 4:30. The government is aware of my application and although they have no objection to my request to reschedule the court date, they make their own request that their time to respond to Mr. Todd's motions be extended to October 31, 2012.

Thank you for your attention to this application.

Respectfully submitted,

Sullivan & Brill, LLP

  
By Steven Brill

cc: AUSAs Michael Maimin and Jessica Masella, *via email*

The Court GRANTS the parties' respective requests as to Defendant Todd's motions only. Accordingly, IT IS HEREBY ORDERED that the government and Defendant Todd shall appear for oral argument and a hearing on Defendant's pending motions on November 7, 2012 at 4:30 p.m. IT IS FURTHER ORDERED that the government's time to respond to Defendant's motions be extended until October 31, 2012.

SO ORDERED

Date:

10/19/12

  
RICHARD J. SULLIVAN  
U.S.D.J.